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Docket Management Room PL-401
National Highway Traffic Safety Adm. (NHTSA)
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
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**COMMENTS ON PROPOSED RULEMAKING TO REQUIRE A RE-ORDERING
OF THE INFORMATION IN THE TIRE IDENTIFICATION NUMBER (TIN)**

Re: Docket No. NHTSA-01-11157 – 8

CIMS is replying to NHTSA's request for comments on the proposal to change the sequence of the TIN.

We believe that this proposal is without merit and should be dropped. Consumers and tire manufacturers or their registration designees must rely on the TIN to determine whether or not a tire is involved in a safety-related recall. This proposal will create tremendous confusion, especially during the conversion period when there would be some tires in the distribution system with the new TIN and some with the old TIN. This conversion period could last several years and we do not see how the change will make identifying tires involved in a recall any simpler. The utter confusion created by having two different TIN formats in use at the same time will be a disaster.

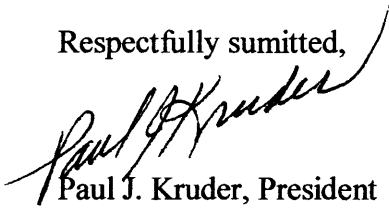
In addition to the confusion this change would create it would mean that:

- * Future format changes similar to the recent expansion of the date code from three to four characters would be impossible.
- * Rretreaders who use a three-digit plant code could not be accommodated.

- * There would be no way for tire manufacturers and their designees to determine with absolute certainty which format they are looking at when they search their tire registration data bases looking for tires involved in a safety related recall.

In summary, CIMS believes that changing the current tire serial number format, which has been in use for over 30 years, would do nothing to help get defective tires off America's highways and in fact would do far more harm than good. We urge NHTSA to abandon this proposal.

Respectfully submitted,



Paul J. Kruder, President